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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

APR 3 4 49 PM '00

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T17-3)

The United States Postal Service hereby provides the response of witness Van–Ty-Smith to the following interrogatory of United Parcel Service: UPS/USPS–T17-3, filed on March 20, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 April 3, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO UPS INTERROGATORIES

UPS/USPS-T17-3. Provide all SAS code and log files used to generate Postal Service library reference USPS-LR-I-184. Where applicable, provide the output data or files produced by each program.

RESPONSE TO UPS/USPS-T17-3.

The JCL, SAS code listing for program "LRI184", and the SAS log files are contained in the diskette filed in USPS-LR-I-255. Other SAS programs included in the JCL are already available from one of the two diskettes filed in USPS-LR-I-106. The output data are SAS tables contained in the diskette filed in USPS-LR-I-184 where they have been converted to EXCEL format.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van Eyrmita

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 April 3, 2000